BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO UPS INTERROGATORIES REDIRECTED FROM WITNESS BRADLEY (UPS/USPS-T16-2-3)

The United States Postal Service hereby moves for late acceptance of its responses to the following interrogatories of United Parcel Service: UPS/USPS-T16-2-3, filed on November 1, 2001. As these responses are only one day late, the Postal Service believes that no party will be prejudiced by the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 16, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 November 16, 2001